



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 2, 2021

By Email and USAFx

Paul A. Goldberger
Renee Melinda Wong
c/o Goldberger & Dubin PC
401 Broadway, Suite 306
New York, New York 10013

Re: United States v. Congying Zheng
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional discovery in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
China Daily webpage	CZ002385	CZ002385
SMS and MMS messages	CZ002386	CZ002402
Citibank records	CZ002403	CZ002607
Discover Bank records	CZ002608	CZ002993
Discover Bank records	CZ002994	CZ003096
Equifax records	CZ003097	CZ003106
GTA records	CZ003107	CZ003200

Description	Begin Bates	End Bates
Guam Department of Revenue and Taxation records	CZ003201	CZ003207
JP Morgan Chase & Co. records	CZ003208	CZ003820
JP Morgan Chase & Co. records	CZ003821	CZ004055
Lycamobile records	CZ004056	CZ004056
New York State Department of Motor Vehicle records	CZ004057	CZ004081
Pinger records	CZ004082	CZ004085
Law enforcement records associated with Congying Zheng	CZ004086	CZ004090
Electronic Messages and Draft Translation	CZ004091	CZ004107
uShip records	CZ004108	CZ004132 & CZ004187
FBI Laboratory Report	CZ004133	CZ004139
FBI Laboratory Report	CZ004140	CZ004145
Facebook records	CZ004146	CZ004149
Electronic Messages and Draft Translation	CZ004150	CZ004150
Electronic Messages and Draft Translation	CZ004151	CZ004151
Electronic Messages and Draft Translation	CZ004152	CZ004152
Electronic Messages and Draft Translation	CZ004153	CZ004153

Description	Begin Bates	End Bates
Electronic Messages and Draft Translation	CZ004154	CZ004154
Electronic Messages and Draft Translation	CZ004155	CZ004155
Electronic Messages and Draft Translation	CZ004156	CZ004156
Yahoo! records	CZ004157	CZ004157
Yahoo! records	CZ004158	CZ004158
Apple records	CZ004159	CZ004159
Google records	CZ004160	CZ004160
T-Mobile records	CZ004161	CZ004161
Electronic communications associated with Michael McMahon	CZ004162	CZ004162
Apple records	CZ004163	CZ004166
Capital One Bank records	CZ004167	CZ004167
AT&T records and data	CZ004168	CZ004168
eBay records	CZ004169	CZ004169
Paypal records	CZ004170	CZ004170
Google records	CZ004171	CZ004171
Google records	CZ004172	CZ004172

Description	Begin Bates	End Bates
Lycamobile records	CZ004173	CZ004173
Microsoft records	CZ004174	CZ004174
Scottrade records	CZ004175	CZ004175
T-Mobile records	CZ004176	CZ004176
T-Mobile records	CZ004177	CZ004177
T-Mobile records	CZ004178	CZ004178
Photographs and video	CZ004179	CZ004179
Yahoo records	CZ004180	CZ004180
Yahoo records	CZ004181	CZ004181
T-Mobile records	CZ004182	CZ004182
T-Mobile records	CZ004183	CZ004183
Verizon records	CZ004184	CZ004184
Audio recording	CZ004186	CZ004186

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers certain of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9.”). The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)